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Attorneys for Defendants
TVI, INC. d/b/a SAVERS and VALUE
VILLAGE; and SAVERS, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

EARL GODHIGH, and ANGELA OSGOOD,
individually and on behalf of all other members
of the general public similarly situated and on
behalf of other similarly aggrieved employees
pursuant to the California Private Attorneys
General Act,

Plaintiffs,

v.

TVI, INC. D/B/A SAVERS and VALUE
VILLAGE; and SAVERS, LLC.,

Defendants.

Case No. 3:16-cv-02874-WHO

**JOINT STIPULATION AND
ORDER TO EXTEND
THE TIME TO FILE DEFENDANTS'
OPPOSITION AND PLAINTIFFS'
REPLY TO PLAINTIFFS' MOTION
FOR CONDITIONAL CERTIFICATION**

Ctrm: 2, 17th Floor
Judge: William H. Orrick,
District Judge

Complaint Filed: 05/27/2016
Trial Date: None Set

Pursuant to Civil Local Rule 6-1(a), Defendants TVI, INC. D/B/A SAVERS and Value Village and SAVERS, LLC and Plaintiffs Earl Godhigh and Angela Osgood and, by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, Plaintiffs served their Notice of Motion and Motion for Conditional FLSA Collective Action Certification and Issuance of Notice on September 21, 2016;

WHEREAS, Defendants currently have until October 5, 2016 to answer or respond to Plaintiffs' Motion for Conditional Certification;

WHEREAS, Defendants have requested and Plaintiffs have consented to an additional 14

1 days for Defendants' to file their opposition to Plaintiffs' Motion for Conditional Certification;

2 WHEREAS, Defendants agree to toll the Fair Labor Standards Act claims, and only those
3 claims, for the prospective members of the collective action for an additional 14 days from
4 October 5 to 19, 2016;

5 WHEREAS, the parties agree that Plaintiffs' reply for the Motion for Conditional
6 Certification shall be due 14 days following Defendants' filing of their opposition to Plaintiffs'
7 Motion for Conditional Certification;

8 WHEREAS, an additional 14 days for Defendants' opposition and an additional 14 days
9 for Plaintiffs' reply to the Motion for Conditional Certification will not alter the date of any event
10 or any deadline already fixed by Court order;

11 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties,
12 through their respective counsel, that: (1) Defendants shall file their opposition to Plaintiffs'
13 Motion for Conditional Certification no later than October 19, 2016; (2) Plaintiffs shall file their
14 reply to Plaintiffs' Motion for Conditional Certification no later than November 2, 2016; (3) the
15 Fair Labor Standards Act claims, and only those claims, for the prospective members of the
16 collective action for an additional 14 days to October 19, 2016; and (4) the hearing on Plaintiffs'
17 Motion be set for November 16, 2016, at 2:00 p.m., or as soon thereafter as the Court is available.

18 Dated: October 5, 2016

JACKSON LEWIS P.C.

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20 By: /s/ Douglas G.A. Johnston
21 Fraser A. McAlpine
22 Douglas G.A. Johnston
23 Attorneys for Defendant
TVI, INC. d/b/a SAVERS and VALUE
VILLAGE; and SAVERS, LLC

24 Dated: October 5, 2016

OUTTEN & GOLDEN LLP

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26 By: /s/ Jahan C. Sagafi
27 Jahan C. Sagafi
28 Attorneys for Plaintiffs

CERTIFICATION OF CONCURRENCE FROM ALL SIGNATORIES

I, Douglas G.A. Johnston, am the ECF user whose ID and password are being used to file this Joint Stipulation Regarding the Extension of Time to Oppose and Reply to Plaintiff's Motion for Conditional Certification. In compliance with N.D. Cal. Civ. L.R. 5-1(i)(3), I hereby attest that I have obtained the concurrence of each signatory to this document and have obtained authorization to use their electronic signature to sign this document.

Dated: October 5, 2016

JACKSON LEWIS P.C.

By: /s/ Douglas G.A. Johnston
Douglas G.A. Johnston

1 Having considered the above stipulation by the parties, the Court Orders as follows:

2 1) Defendants shall file their opposition to Plaintiffs' Motion for Conditional Certification no
3 later than October 19, 2016; (2) Plaintiffs shall file their reply to Plaintiffs' Motion for
4 Conditional Certification no later than November 2, 2016; (3) the Fair Labor Standards Act
5 claims, and only those claims, for the prospective members of the collective action for an
6 additional 14 days to October 19, 2016; and (4) the hearing on Plaintiffs' Motion be set for
7 ~~November 16, 2016~~, at 2:00 p.m., or as soon thereafter as the Court is available.

8 November 30, 2016

9 IT IS SO ORDERED

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11 Date: October 14, 2016


12 THE HONORABLE WILLIAM ORRICK
13 UNITED STATES DISTRICT JUDGE
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